

PROGRESSIVE BUSINESS PUBLICATIONS

376 Technology Drive • Malvern, PA 19355

(610) 695-8600 Ext. 206 • FAX: (610) 651-2921 • E-MAIL: Satell@pbp.com

**EDWARD M. SATELL
PRESIDENT**

April 29, 2003

Federal Communications Commission
Office of the Secretary

**RE: Rules and Regulations Implementing the Telephone Consumer
Protection Act of 1991 – CG Docket No. 02-278**

To Whom It May Concern:

Progressive Business Publications urges the FCC to not adopt a national do-not-call list. Instead, we urge the FCC to reaffirm its prior analysis and decision stating that company specific DNC lists accomplish the same goals: protecting the consumer without unduly burdening the teleservices industry.

PBP is a Malvern, Pennsylvania based information provider company that employs well-over 700 people and operates 14 call centers. We bring needed jobs with good pay to rural communities that are experiencing high unemployment including: Altoona, Clearfield, Dubois, Hazelton, Pottsville and Wyomissing, Pennsylvania, as well as centers in New Jersey, Woodbury, Cape May and Vineland. Our offices provide a healthy, clean, positive and office environment with many employees enjoying years of consistent employment with us.

Should the FCC decide to support this national DNC list, it would have the following negative impact:

- 1. Elimination of hundred of thousands of jobs, nationwide will create a serious unemployment problem.**
- 2. Hurt our already ailing economy.**
- 3. Disproportionately hurt small businesses and start-ups.**
- 4. Decrease the availability of low cost goods and services**
- 5. Cost the Federal Government billions of dollars in lost tax revenue.**
- 6. Increase the cost of goods and services.**
- 7. Increase the welfare rolls and burden the Federal Governments assistance programs.**

We urge you to consider that:

1. Independent research shows that between five and six million people are employed by the telemarketing industry.
2. Adopting this overly broad, burdensome national list will unduly burden the teleservices industry and substantially raise costs by the requirement to purchase DNC lists and fee schedules. This will force the elimination of many jobs that are disproportionately held by working mothers, minorities and other people who do not have a lot of other employment opportunities.
3. Telemarketing provides a legitimate service to customers who appreciate the ease and affordability of buying over the phone. For those who don't want such services, calls can be easily blocked or screened with caller ID.
4. Free enterprise, the backbone of our economic system, means the freedom to initiate, send information and be creative as long as it's not coercive or deceptive. Free speech is not to protect the majority, but the minority, to protect the dispersion of ideas, commercial and otherwise.

As such the nation tolerates some unpopular speech and actions that some people don't like including:

- Distasteful pornography
- Distortions and deception of free press
- Some content on television
- Press camping out across the street from our homes
- Junk Mail
- Telemarketing calls disbursing information about a commercial transaction

5. Today's economy is ailing. Jobs are tougher to come by and those out of work and those unable to find work will resort to getting assistance from the Federal Government.
6. The marketplace may decrease as new start-up businesses and smaller businesses may not be able to survive without this most cost-effective method of generating new business in their local communities. In the absence of unlawful or coercive activity, the marketplace should be allowed to work.

In closing, we again urge you protect thousands of jobs in a legitimate industry that serves consumers by not supporting CG Docket No. 02-278. There are other far less destructive ways to protect consumers such as company-specific DNC lists, devices and services to screen calls, or by simply saying no thank you and hanging up the phone.

Sincerely,
Ed Satell